

SEALED
United States District Court
NORTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

COMPLAINT

FILED
OCT - 2 2015
CLERK, U.S. DISTRICT COURT
By _____ Deputy *[Signature]*

V.

KRISTOPHER LEDELL LOVE

CASE NUMBER: 3-15-MJ-*739-BF*

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief: On or about October 1, 2015, in the Dallas Division of the Northern District of Texas, **Kristopher Ledell Love**, the defendant,

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate and foreign commerce a firearm, to-wit: a Smith & Wesson, model SD40VE, .40 caliber pistol, bearing serial number DVV2460,

in violation of 18 U.S.C. § 922(g)(1).

I further state that I am a(n) Special Agent (SA) with the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:

See attached Affidavit of SA Jason Ibrahim, which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: X Yes _____ No

Jason Ibrahim
JASON IBRAHIM
Special Agent, FBI

Sworn to before me and subscribed in my presence, on this 2 day of October, 2015, at Dallas, Texas.

PAUL D. STICKNEY
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer

Paul D. Stickney
Signature of Judicial Officer

AFFIDAVIT

I, Jason Ibrahim, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, deposes and states:

INTRODUCTION

1. I am a Special Agent for the FBI and I know that it is a violation of 18 U.S.C. § 922(g)(1) for a person who has been convicted for a crime punishable by imprisonment for more than one year, that is, a felony offense, to possess a firearm in or affecting commerce. I am familiar with the facts and circumstances of the investigation set forth below through my personal participation; from discussions with other agents and law enforcement officers; and from my review of records and reports relating to the investigation.

2. Because this affidavit is submitted for the limited purpose of securing an arrest warrant, via criminal complaint, for **Kristopher Ledell Love** for possession of a firearm by a convicted felon, violation 18 U.S.C. § 922(g)(1). I have not included details of every aspect of the investigation. Probable cause exists to believe that **Kristopher Ledell Love** violated 18 U.S.C. § 922(g)(1) on or about October 1, 2015, in the Dallas Division of the Northern District of Texas.

THE RELEVANT FACTS

1. On Wednesday, September 2, 2015, at approximately 7:45 pm, Dallas police responded to a shooting call at 1700 Cedar Springs Road, Dallas, Texas, Dallas

County, Texas. When they arrived they found Kendra Hatcher, the victim, deceased in the parking garage from a gunshot wound to the head, inflicted by a .40 caliber firearm. The parking garage was equipped with security cameras that captured the image of a 1996 Jeep Cherokee used by the individuals responsible for the shooting.

2. On September 4, 2015, witness Person A contacted a Dallas Police officer to inform the officer that he had information regarding the complainant's death. Person A said that he loaned his 1996 Jeep Cherokee to a female identified as Person B. Person A said that on September 3, 2015, he observed still photos of his vehicle (the 1996 Jeep Cherokee) on the news related to the complainant's death. Your affiant has learned that at the time of her death, the victim was dating Person B's ex-boyfriend and the two were scheduled to leave for a trip to Mexico the following day.

3. On September 4, 2015, DPD officers met with and interviewed Person B, who stated that she had in fact borrowed the 1996 Jeep Cherokee from Person A but that she loaned the vehicle to a subject identified as Person C on the day of the shooting. Person C voluntarily came to Dallas police headquarters. She was advised of her *Miranda* warnings and voluntarily waived her rights and gave a statement. In that statement and subsequent statements to law enforcement, Person C admitted that she conspired with Person B and others, including the shooter whom she subsequently identified as "Kris" LNU, to rob the victim in the parking garage of 1700 Cedar Springs Road. Person C stated that she was paid U.S. currency to drive the individual that

ultimately shot and killed the victim to and from the complainant's parking garage where the offense took place. Person C advised that she did not know "Kris" LNU and that Person B instructed her when and where to pick him up shortly before the shooting took place.

4. Person C stated that after she picked "Kris" LNU up at the designated location in the Jeep Cherokee, she drove to the victim's residence and into the parking garage located at 1700 Cedar Springs Road sometime after 7:00 pm on September 2, 2015. According to Person C, the person she identified as "Kris" LNU was hiding in the back of the vehicle so that surveillance cameras could not record him when they entered the parking garage. Person C stated that she and "Kris" waited in the garage for several minutes until she observed the victim drive in and park. Person C stated that "Kris" LNU exited the Jeep and returned a short time later after she heard a gunshot. According to Person C, "Kris" LNU had two purses in his hand when he got back into the backseat of the Jeep. Person C advised she then drove out of the parking garage and dropped "Kris" LNU off at an intersection in Dallas. After "Kris" LNU got out of the Jeep, Person C drove to a location to meet Person B and Person B took possession of one of the complainant's purses at that time.

5. During an interview with Person C conducted on September 29, 2015, she advised DPD officers that a friend of hers she identified as Person D met with Person B in the days leading up to September 2nd at an apartment complex in Dallas, Texas.

Person C stated that she overheard Person B ask Person D at the meeting if he knew someone that could take care of something for her and Person D responded that he could find someone. In the interview, Person C advised officers that she believed that Person D was the individual responsible for locating "Kris" LNU and putting her in contact with Person B. Person C advised officers that at the time she drove into the victim's parking garage on September 2nd, the victim had not yet arrived and she and "Kris" LNU sat together in the Jeep waiting for the complainant to arrive. During that period of time she asked "Kris" LNU "how much Person B was paying him to do this" and "Kris" LNU responded that it was none of her business. Person C stated that after the shooting, "Kris" LNU advised her that if she told the police anything about him, she and her six year old son would be next. Person C identified for officers the vehicle that "Kris" LNU used was a blue Chrysler Sebring with a black top and Tennessee license plates. Person C advised law enforcement that Person B was upset that her former boyfriend was dating the victim and had recently taken her to San Francisco to meet his parents. Person C stated that it was her belief that the victim would be robbed and not killed.

6. Also during the interview conducted September 29, 2015, Person C detailed for officers her whereabouts in the days and hours leading up to the shooting. She advised that she had in her possession a Metro PCS cell phone (214-229-XXXX) that she used to communicate with Person B and others. Person C advised that at one point during the late afternoon or early evening of September 2nd, she used her cell phone to

contact Person B to try to “back out” but Person B did not answer. She also stated that after the murder, Person B asked her to use her cell phone to contact “Kris” LNU on his cell phone, 214-721-XXXX. Person C advised law enforcement officers that she believes that 214-721-XXXX is the cellular telephone that “Kris” LNU used on the day of the offense. Law enforcement agents have reviewed the telephone toll records associated with Person C’s cell phone. The Metro PCS records reveal that Person C’s cell phone made contact or attempted to make contact with 214-721-XXXX on the day before the shooting, the morning of the shooting and the day after the shooting. A review of Person B’s cell phone records revealed that a cell phone she used on September 1, 2015, also had contact with 214-721-XXXX prior to the murder.

7. On or about October 1, 2015, a Dallas Police detective and two FBI agents were conducting surveillance at XXXX Marvin D. Love, Dallas, Texas, with regard to the cellular telephone utilizing 214-721-XXXX. Detectives identified the blue Chrysler Sebring with the black top with Tennessee license plates that Person C had previously identified as “Kris” LNU’s vehicle. The officers observed **Kristopher Ledell Love** exit the apartments and enter this vehicle. **Love** drove to another complex nearby and parked. A female then entered the vehicle and then Person D approached the driver’s window and conversed with **Love**. Dallas Police Department officers approached **Love** and Person D and **Love** exited the vehicle. They identified **Love** and determined that he had an active warrant out of Tennessee, and that Person D had an active warrant out of Dallas County. Officers did an inventory search of the vehicle and located the cellular telephone utilizing

214-721-XXXX. The vehicle was towed to the auto pound and subsequently searched pursuant to a state search warrant. During the search of the vehicle ATF Special Agent Daniel Kaase and his explosive-detecting canine performed an open air sniff within the vehicle. The canine gave a positive alert near the ashtray within the vehicle. Detectives subsequently located and seized a Smith & Wesson pistol, model SD40VE, .40 caliber pistol, bearing serial number DVV2460 under the front seat of the vehicle. Officers also located mail and other personal items belonging to Love within the vehicle.

8. **Love** is a person prohibited from possessing a firearm on October 1, 2015, because he had previously been convicted for a crime punishable by imprisonment for more than one year, that is, a felony offense. Specifically, **Love** was convicted in 2005 for aggravated robbery in Shelby County, Tennessee, and sentenced to eight years imprisonment for this offense.

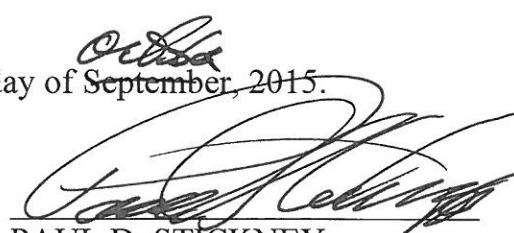
9. On October 2, 2015, ATF Special Agent Kenneth Benton, an interstate nexus expert, determined that the Smith & Wesson pistol, model SD40VE, .40 caliber pistol, bearing serial number DVV2460 , that Love possessed on October 1, 2015, was possessed in commerce, that is, that before **Love** possessed this firearm, it had traveled at some time from one state to another.

[NO FURTHER INFORMATION ON THIS PAGE]

10. Accordingly, I believe that there is probable cause that on October 1, 2015, in the Dallas Division of the Northern District of Texas, **Kristopher Ledell Love** (BM/DOB March XX, 1984) knowingly possessed a firearm in violation of 18 U.S.C. § 922(g)(1), and I request that this Court issue a warrant for his arrest for this offense.

Jason Ibrahim
Jason Ibrahim
Federal Bureau of Investigation

Sworn to before me this 2 day of September, 2015.


PAUL D. STICKNEY
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF TEXAS